

# **EXHIBIT H**

**To:** Jennifer Dorminey Herzog[jherzog@hallboothsmith.com]  
**Cc:** Vickers, Tracie[Tracie.Vickers@coffeecounty-ga.gov]  
**From:** Charles Dial[charles.dial@coffeecounty-ga.gov]  
**Sent:** Thur 5/5/2022 12:08:00 PM Eastern Daylight Time  
**Subject:** Re: 5.2.22 Open Records Request

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Looks good just need to fix my fat fingers.

Thanks

Charles Dial  
SGCCE, INC

Sent from my iPhone

On May 5, 2022, at 9:40 AM, Jennifer Dorminey Herzog <jherzog@hallboothsmith.com> wrote:

Charles, to make it easier for me, I put your responses below in red. Just confirming I didn't miss anything.  
Thanks!

## Jennifer Dorminey Herzog

Attorney at Law | Hall Booth Smith, P.C.

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**O:** 229.382.0515 1564 King Road  
**D:** 229.339.8856 Tifton, GA 31793  
hallboothsmith.com



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**From:** Charles Dial <charles.dial@coffeecounty-ga.gov>  
**Sent:** Wednesday, May 4, 2022 4:14 PM  
**To:** Vickers, Tracie <Tracie.Vickers@coffeecounty-ga.gov>  
**Cc:** Wendell Stone <wendellstone2000@yahoo.com>; Matthew McCullough <mwmccul@yahoo.com>; Ernestine Thomas-Clark <etclark@windstream.net>; Ernestine ThomasClark <ernestine.thomasclark@coffeecounty-ga.gov>; ericchaneys80@gmail.com; Jennifer Dorminey Herzog <jherzog@hallboothsmith.com>; Andy Thomas <athomas31552@gmail.com>; Rachel Roberts <Rachel.Roberts@coffeecounty-ga.gov>; Vickers, Wesley <Wesley.Vickers@coffeecounty-ga.gov>  
**Subject:** Re: 5.2.22 Open Records Request

See below response

Thanks

Charles Dial  
SGCCE, INC

Sent from my iPhone

On May 2, 2022, at 10:50 AM, Vickers, Tracie <[Tracie.Vickers@coffeecounty-ga.gov](mailto:Tracie.Vickers@coffeecounty-ga.gov)> wrote:

Good Morning Board Members, We have received a new open records request this morning from Ms. Marilyn Marks. This request involves additional information that is different from her previous requests. Please review each bullet point and search any form of correspondence that you may have such as paper records , emails and text that you may have pertaining to this specific request. Please also focus on determining if you have records responsive to numbers 3,5,6,12 and 13. I know you have all responded to various requests before. However, each time we get a new request that involves any information that you all may have with responsive records, I will continue to send them to you for your review and response for our records. We will need your response as soon as you possible so that Jennifer can prepare a response within the next 3 days, as required by law.

Thank you!

Tracie Vickers  
County Clerk / Open Records Custodian

Tracie Vickers  
County Clerk  
Coffee County Commissioners  
101 South Peterson Avenue  
Douglas, GA 31533  
912-393-7108

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**From:** Marilyn Marks <[Marilyn@USCGG.org](mailto:Marilyn@USCGG.org)>  
**Sent:** Monday, May 2, 2022 7:42 AM  
**To:** Jennifer Dorminey Herzog <[jherzog@hallboothsmith.com](mailto:jherzog@hallboothsmith.com)>; Vickers, Tracie <[Tracie.Vickers@coffeecounty-ga.gov](mailto:Tracie.Vickers@coffeecounty-ga.gov)>; Rachel Roberts <[Rachel.Roberts@coffeecounty-ga.gov](mailto:Rachel.Roberts@coffeecounty-ga.gov)>  
**Subject:** 5.2.22 Open Records Request

This is a public records request. Please provide electronic copies of the requested records. The records should include records in the possession of current and previous election officials (including Misty Hampton and Jil Ridlehoover) as well as county attorneys and vendors. If any record is denied or withheld, please specifically state which specific record is being withheld and the basis for withholding, including the legal citations. Please produce:

1. All emails, text messages, and related documents related to Coffee County matters from the period November 3, 2020 through the date of your response between any Hall Booth Smith attorney representing Coffee County officials and any representative of the Georgia Secretary of State office or the State Election Board. For purposes of this request, the email search may be limited to addresses (including cc: or bcc) using domain "sos.ga.gov" for the email address of state officials. (Previously produced emails need not be produced again.)

2. All emails, text messages, and related documents regarding Coffee County matters from the period November 3, 2020 through the date of your response between any Hall Booth Smith attorney representing Coffee County officials and any of the following individuals (including cc and bcc):

- a. Shawn Still
- b. Kurt Hilbert
- c. Cathy Latham
- d. Ed Voyles
- e. David Shafer
- f. Dominic LaRicca
- g. Scott Hall
- h. Doug Logan
- i. Russell Ramsland
- j. Preston Halliburton
- k. Frances Watson
- l. Brad Raffensperger
- m. Jordan Fuchs
- n. Gabriel Sterling
- o. Michael Barnes
- p. any Dominion voting systems representative
- q. Chris Harvey

3. All documents including communications (emails, telephone notes, and text messages) and vote count documentation related to or regarding the manual count of Coffee County election ballots on or about December 12, 2020 occurring in conjunction with a local school involving Coffee County officials and school students. Records should include any documents and communications in the possession of Coffee County management (including Hampton and Ridlehoover), past or present Coffee County election board members, and attorneys representing Coffee County officials. The purported count is referenced in the attached minutes of the 12/30/20 Senate Judiciary Committee minutes in testimony by Cathy Latham. (emails on the county computers used by Hampton and Ridlehoover should be searched.)

4. System logs for all ICC scanners used in the November 3, 2020 original count and recount. The system log should include all system log entries from October 1, 2020 through June 30, 2021.

5. All communications (including emails, text messages and voicemails) related to the Shawn Still v Brad Raffensperger *et al.* (Fulton County Superior Court 2020cv343711) litigation not protected by attorney client privilege or attorney work product. This request also includes all county attorneys' communications with all other parties, parties' counsel and the Court.

6. For the period February 25, 2021 through June 30, 2021 all election-related communications (including emails, text messages and voicemails) between Lowndes County including Deb Cox and any of the following persons:

- a. Coffee County election officials
- b. Coffee County attorneys
- c. Coffee County management

7. For the period September 1, 2020 through March 31, 2020, records of repair, maintenance or assistance related to the laptop Misty Hampton used for election work and the county computer used by Jil Ridlehoover . Documents to include the records of Charles Dial and SGCCE. **There is no county laptop issued to misty so no records found. We only keep records for 90 day at sgcce. I will not have any records other than what's been sent to the county.**

8. A document identifying the computer Mr. Vickers referenced as "her computer" in the attached July 2, 2021 email. A document identifying the "old computer" referenced the attached July 2, 2021. **I have not documentation no this.**

9. Documents demonstrating the attempt and to obtain a copy of the .ost files of Misty Hampton's emails on the computer referenced on the July 2, 2021 memo attached. Documents produced to date did not include any reference to Mr. Dial's attempt to recover the .ost file of Misty Hampton's email or what his findings were. Please produce the file description, size and time created of the .ost file Mr. Dial created in his attempt to recover Ms. Hampton's emails. (As Mr. Dial notes, cancelling the Microsoft license should have had no impact on the email files resident on Ms. Hampton's computer. Those files should be recoverable and have not been produced.) **there was not ost found. She used outlook web access.**

10.

11. If Ms. Hampton deleted the Outlook email files on the computer as Mr. Dial suggests may have happened, “before she left,” please produce documentation of deletion of Hampton’s emails on the computer referenced. It is my understanding that Ms. Hampton was ushered out of the office immediately upon her termination, in which case she would presumably not have had time to delete her emails. **We have no records of this.**

12. Documents reflecting that Coffee County conducted a review of the email files (including .ost files) resident on the computer Ms. Ridlehoover previously used, in Coffee County’s search for county records responsive to all of my previous relevant records requests. (This also includes any responsive emails in which Ms. Ridlehoover was copied.) **no records found.**

13. Documents including emails related to or following up on the attached emails related to Doug Logan’s business card or Chris Harvey’s suggestion that follow up may be appropriate. Responsive documents should include communications regarding Mr. Logan after November 3, 2020 including those in Ms. Ridlehoover emails. Responsive documents should also include emails from Ms. Watson or others on the SOS investigation staff.

14. Communications after April 19, 2022 with the Secretary of State’s office regarding any investigation.

Please let me know if you have questions about this request.

Marilyn Marks (on behalf of Coalition for Good Governance and also myself as an individual)

Executive Director

[Coalition for Good Governance](#)

Cell: 970 404 2225

[Marilyn@USCGG.org](mailto:Marilyn@USCGG.org)

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